

**UNITED STATES DISTRICT COURT OF THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHICAGO WOMEN IN TRADES,  Plaintiff,  v.  PRESIDENT DONALD J. TRUMP, DEPARTMENT OF LABOR, ACTING SECRETARY OF LABOR VINCENT MICONE, OFFICE OF MANAGEMENT AND BUDGET, DIRECTOR OF THE OFFICE OF MANAGEMENT AND BUDGET RUSSELL VOUGHT, U.S. DEPARTMENT OF JUSTICE, ATTORNEY GENERAL OF THE U.S. DEPARTMENT OF JUSTICE PAMELA BONDI,  Defendants.	Case No. 1:25-cv-02005  Judge: Hon. Matthew F. Kennelly  JURY TRIAL DEMANDED
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**PLAINTIFF’S SECOND MOTION TO SUPPLEMENT THE FACTUAL RECORD  
IN SUPPORT OF PLAINTIFF’S MOTION FOR TEMPORARY  
RESTRAINING ORDER AND MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Chicago Women in Trades (“CWIT”), by and through its undersigned counsel, respectfully move the Court to further supplement the factual record to provide updated information relevant to the Court’s consideration of its pending Motions for Temporary Restraining Order (Dkt. 41) and for Preliminary Injunction (Dkt. 26).

Today, at 1:45 PM CST, CWIT received an email from Jobs for the Future, a pass-through entity which issued the HUB-Apprenticeship USA Grant subaward to CWIT (*see* March 5, 2025 Declaration of Jayne Vellinga (“PI Vellinga Decl.”) ¶¶ 31-36), notifying CWIT that it will be terminating CWIT’s contract under the HUB-Apprenticeship USA Grant. Specifically, the email, which is attached hereto as **Exhibit A** (redacted for privilege), states:

Unfortunately, due to the requirements outlined in the TEN 21-24 restricting activities related to DEI and DEIA, our project has been significantly impacted. As a result, we regret to inform you that we will no longer be able to move forward with the previously scoped activities with your organization. JFF contracted with Chicago Women in the Trades expressly to engage in activities no longer 'allowable' under Federal guidelines, pursuant to Executive Orders 14151 and 14173. Because once-allowable activities are no longer allowable, corresponding funding is no longer available and thus, reduced. As a consequence, JFF will be issuing a notice of Termination of agreement with Chicago Women in the Trades.

The “TEN 21-24” referenced is the “Training and Employment Notice” published by the U.S. Department of Labor (“DOL”) first sent to Ms. Vellinga on January 22, 2025, and resent to CWIT on March 20, 2025. (Dkt. 47). During the March 25, 2025 hearing on Plaintiff’s Motion for a Temporary Restraining Order, the government represented to the Court that DOL’s re-issuance of TEN 21-24 was a “mistake.” Mistake or not, the instructions in TEN 21-14 directly follow and specifically invoke the J20 and J21 Executive Orders. Thus the J20 and J21 Executive Orders have harmed CWIT above and beyond the chilling effect on CWIT’s First Amendment rights.

Plaintiff respectfully request that the Court add the attached Exhibit to the factual record in support of its pending motions.

Dated: March 26, 2025

Respectfully Submitted,

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